



U.S. Department of Energy  
**Office of River Protection**

P.O. Box 450  
Richland, Washington 99352

02-OSR-0494

Mr. R. F. Naventi, Project Manager  
Bechtel National, Inc.  
3000 George Washington Way  
Richland, Washington 99352

Dear Mr. Naventi:

CONTRACT NO. DE-AC27-01RV14136 – DELAY FOR APPROVAL OF AUTHORIZATION BASIS CHANGE NOTICE (ABCN) 24590-WTP-ABCN-ESH-02-027, REV. 0, REVISION TO HIGH LEVEL WASTE (HLW) PRELIMINARY SAFETY ANALYSIS REPORT (PSAR) TO REFLECT PROPOSED DESIGN MODIFICATIONS TO MELTER POUR SPOUT AND VESSEL STUB OUTS

Reference: BNI letter from A. R. Veirup to M. K. Barrett, ORP, "Transmittal for Approval – 'Authorization Basis Change Notice 24590-WTP-ABCN-ESH-02-027, Revision 0, Revision to HLW PSAR to Reflect Proposed Design Modifications to Melter Pour Spout and Vessel Stub Outs'," CCN 038761, dated September 11, 2002.

This letter responds to the Reference that requests approval and incorporation of the subject ABCN, which proposes design modifications to HLW melter pour spout and vessel stub outs, in the Preliminary Safety Analysis Report (PSAR). Due to the late submittal of this request and the adverse impact this review would have on the issuance of the PSAR, the U.S. Department of Energy (DOE), Office of River Protection (ORP) will begin its review of ABCN 24590-WTP-ABCN-ESH-02-027 on October 25, 2002. If this schedule creates an unplanned impact to the project construction schedule, BNI is requested to notify the ORP, describe the schedule impact, and propose a course of action supportive of project construction schedules that is consistent with the Contract provisions. This justification also should describe any other significant modifications to the authorization basis to be requested in the next fiscal year, so that DOE has sufficient information to plan its review of these changes.

The ORP wishes to remind BNI that Standard 7, Environment, Safety, Quality, and Health, paragraph (e)(2)(vi) of the Waste Treatment and Immobilization Plant (WTP) Contract (DE-AC27-01RV14136), the Contractor is required to submit the Construction Authorization Request, which includes the PSAR, to DOE seven (7) months prior to the need for approval of the Authorization to Proceed with construction. In addition, Standard 7, paragraph (e)(2)(x) provides for segmented and incrementally submitted authorization requests. However, the paragraph specifies that the prescribed time frame for DOE review of a deliverable begins with receipt of the last component of the deliverable, and may be shortened at the discretion of DOE based on the quality and content of the component. For each such request, the Contractor is required to demonstrate the need for the phased authorization and provide sufficient detail in the request for DOE to review the request and reach an approval decision. Finally, the Contractor is required to Mr. R. F. Naventi

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notify DOE of the intent to submit a partial Construction Authorization Request, complete with the scope and content of the proposed request, not less than 4 months prior to its submission. These Contract provisions were not satisfied by the BNI request for review and approval of 24590-WTP-ABCN-ESH-02-027.

If you have any questions, please contact me, or your staff may contact Lewis F. Miller, Jr., Office of Safety Regulation, (509) 376-6817.

Sincerely,

Roy J. Schepens  
Manager

OSR:RWG